

TRIBAL COMMENTS ON PROPOSED CHANGES TO THE PACIFIC HALIBUT CATCH  
SHARING PLAN FOR 2018

The Coastal Treaty Tribes have reviewed the proposals put forward by the public and Council Advisory Bodies reflected in WDFW reports from June and September ([Agenda Item G.1.b, Supplemental WDFW Report, June 2017](#) and [Agenda Item G.1.b, WDFW Report 1 and Supplemental WDFW Report 2, September 2017](#)) and offer the following initial comments.

We have been pleased with the recent improvements to halibut management throughout Area 2A as well as the cooperative nature among Area 2A managers and stakeholders in securing a higher total allowable catch (TAC) for 2A in recent years. As such, we have some concerns with any major changes to the Catch Sharing Plan (CSP). While we generally do not comment on the manner in which our state co-managers ultimately manage their allocations, some of the proposed changes being put forward give us pause from either a management or economic perspective. Since these changes are proposed in federal waters and potentially have an impact on either the available 2A TAC or to our tribal communities, we want to put our concerns on the record.

The proposal to reallocate incidental sablefish catch would turn retained incidental catch, which provides an economic benefit to our coastal communities, into discarded bycatch. This would impact all of 2A because bycatch that is not retained is translated into wastage that is taken “off the top” of our 2A TAC.

We also have a concern regarding the potential economic impact of changing sub-area specific allocations in Washington, whether those are changed into a statewide allocation or reallocated to California. It is difficult to assess those impacts at this time without additional economic information or analyses. Additional analysis of those impacts and additional discussion among the co-managers would be appreciated prior to November.

We anticipate providing further comments on any specific changes proposed for the CSP in November that might impact our tribal communities or the overall quota available for Area 2A.